

June 14 Workshop on BLM Wild Horse & Burro Draft Strategy Facilitation Team Summary Notes

These summary notes of questions and public comments were taken by the facilitation team during the question/answer and comment periods during the June 14th workshop on the BLM Wild Horse and Burro Draft Strategy. The notes are not a verbatim record of the meeting. They were projected on a screen in the workshop as they were being created to promote transparency and provide an opportunity for immediate review by all meeting participants. The language was revised in real time to reflect participant feedback. The facilitation team has reviewed the summary notes for basic grammar and clarity but has chosen to leave them essentially “as taken.” To the extent the notes do not fully capture the intent of a question or comment, that result was not intended.

BLM confirmed at the June 14 workshop that the online comment tool that can be accessed at www.blm.gov is the primary vehicle for submitting comments on the draft strategy document. The facilitation team understands that these summary workshop notes will also be considered by the BLM as it reviews all input about the draft strategy document. BLM also advised at the workshop that it will consider comments mailed to its Washington office.

The facilitation team allowed audience members to show support for different comments as a way of limiting duplicative statements and maximizing the use of time. This process—a show of hands and estimate of the number, without counting—was not a vote, and this was explained at the workshop. [In these summary notes, parenthetical numbers after comments indicate very rough estimates of the number of audience members who raised their hand to show support for a comment.] In some cases there was no show of hands.

Draft Strategy Element: Treasured Herds

Questions:

1. Are treasured herds going to be located on preserves in the Midwest or the east, or on the public lands on the west (e.g. in Nevada)?
2. Will treasured herds only be designated/located by local communities, or will the broader public also have a role in the designation process?
3. How will non-treasured herds be protected, in comparison with treasured herds? What is the public assurance for protection?
4. Will there be a limit on the number of treasured herds designated?
5. Is it correct that having a substantial volunteer base (community support) influences treasured herd designation?
6. How will different wildlife habitats play into the designation process? Through land management planning processes and compliance with environmental regulations?
7. Didn't the 1971 law already designate all wild horses and burros as treasured herds, and would you need to alter the law in order to designate treasured herds as you're proposing?

Comments:

1. Concern about increased privatization, increased user fees, through treasured herd program as proposed. Concern about loss of transparency/data due to

- public/private partnership. Concern about single-use management approach. (100)
2. Do not think accessibility is necessary for designations (does not need to be near cities). May need to use other considerations than local support – locals may not have awareness about benefits of ecotourism. Treasured herds should not be on preserves, they should be in the wild context. (80)
 3. Concern that designating treasured herds may result in lack of public understanding about horses/burros in their wild context. Showcasing should be comprehensive re: evolution, environment. (20)
 4. Support treasured herd idea; from my experience it works. Does take community support to make it work. (15)
 5. Concern about terminology of “treasured” herds – implies that other herds are not treasured. Term will become institutionalized – concern re: public perception. Oppose how BLM is proposing to use the term. (100)
 6. Objective 2, action 1. Concern about whether horses would be protected from slaughter when under tribal management. (80) Treasured herds should be left wild (no limiting herd size, manipulating herds). (90)
 7. Only local areas should determine if treasured herds should be designated. (20) BLM should re-evaluate appropriate management levels (AMLs) for herd management areas (HMAs) according to multiple use management.
 8. Concern about distinction of treasured herds, and that those not designated as treasured also have distinct/unique evolution. Suggest that we showcase herds via education – can do that for all wild horses. (90)
 9. Think each state with wild horses should participate in ecotourism and promotion of herds. (70) Should not take herds below 200 head – will not be sustainable for long-term survival.
 10. Concern about treatment of herds not designated as treasured. (90)
 11. Could we transfer BLM land to state lands as preserves? (0) Maybe instead, local communities could provide input about what is special about each herd in their area (rather than having to designate only specific treasured herds). (5)
 12. Recommend BLM reach out to wild horse advocates and community to identify champions for all 180 existing herds and conduct public education/promotion. (100)
 13. Fully supportive of multiple use but we need to support healthy range lands. If horses and burros are the principle use, need to make sure that habitat can sustain them – should be addressed in initiative. (30)
 14. Need treasured herds to be managed to sustainable levels by BLM – if there are too many horses and they don’t look good, that won’t support ecotourism. (30) Tribes need support managing their herds. (20)
 15. Concern that treasured herds misrepresents health situation of all wild horses on public lands. (30)
 16. Recommend adopt-a-herd program for all herds instead of having treasured herds. (80)
 17. Recommend we use funding towards state marketing/promotion of herds in their states, rather than pursuing treasured herd designations. (70)
 18. Concern about disruptions to herds’ natural social systems and physiology through treasured herd designation/management. (Even if this means that some horses are not healthy due to overpopulation.) (60)
 19. Consider relocation of herds to under-populated HMAs with healthy range lands. (50)

Draft Strategy Element: Preserves

Questions:

1. Who are existing partners? Clarification on looking into transitioning existing herd areas (HAs) to HMAs?
2. Is there any action on private partnership proposals? How can we move forward on them?
3. Has a report been prepared and delivered to Congress, per the Government Accountability Office (GAO) inquiry about 21 million acres? Can we move horses onto closed HMAs rather than wait to designate new preserves?
4. Does BLM intend to make changes without amending the 1971 Wild Free-Roaming Horse & Burro Act?
5. Is BLM considering changing accountability process for preserves (e.g., care/management of animals)?
6. Can the federal government designate more land to wildlife? Who is putting pressure on the government to remove horses?
7. Would roundups actually increase under the proposal?

Comments:

1. Offer tax-based incentives for private partnerships. (20)
2. Important to livestock industry that the 1971 Act not be amended to allow wild horses and burros on livestock lands. Opposed to turning active BLM allotments into preserves. BLM should not purchase lands for preserves – becomes too permanent. (15)
3. Concern about putting energy into managing preserves in Midwest/east when that funding could be used towards improving western ranges and thereby increasing carrying capacity on those ranges. (70)
4. Ample federal land is available for research and education without expanding federal land ownership. (40) No objection to private organizations spending their own money on preserves. Increased numbers of wild horses wherever they are compounds the problem. (30)
5. I proposed a plan to create a sanctuary for wild horses. This is a way to make the horse and burro program work. (60)
6. Preserves should not replace on-range management, should be considered a crisis management strategy. Preserves do not fix the system. (80)
7. Sounds like preserves are similar to long-term holding except public can visit. What about designating the areas horses are located now as preserves? (50)
8. This is a population control issue. Should have non-reproducing herds in preserves. (30)
9. If we focus on laying groundwork on preserves we will lose focus of on-range management. Makes it too easy to accept horses removed from the range. Question about legality of proposed approach. If there are animals are on preserves, where is the public disclosure about what is going on, and would those animals still be available for adoption? (40)
10. Need to prioritize areas that don't conflict with BLM's multiple use mandate. (30) Education needs to be holistic and unbiased – may need an education technical review committee. (40)
11. Should use private dollars to purchase land, and if it goes to a foundation then the money goes directly back to the horses. Sanctuary should be in northern Nevada or a western state where horses already are. Sanctuary would be open to general public and have total transparency/accountability. (60)

12. Have 654M acres of federal land; wild horses allotted to 26.6M of those federal acres. Have 70,000 horses in holding and on the range, and 1-3M head livestock on BLM lands and several million big game animals. Horses are not overpopulated by comparison. (60)
13. Until we can put the 19.6M acres from the GAO report back to use for horses, it's premature to buy preserves. (50) Need to know that science is sound on population numbers and sustainability before designating more preserves. (60)
14. Need to consider sustainability of wildlife and landscape – make sure you undertake appropriate environmental review. (30)
15. Support not killing horses deemed in excess or un-adoptable. Moratorium on roundups to present need for more preserves. (50)
16. Focus on animal welfare and natural physiology on preserves. (50)
17. BLM should be able to use any means necessary to dispose of excess horses. (20)
18. Support preserves because they provide year-round habitat. Protection of ecosystem overall has to be paramount. (50)
19. Need to ensure accountability of management on preserves. Consider incorporating trusted public individuals into process. (60)

Draft Strategy Element: Sustainable Herds:

Questions:

1. Why is BLM not focusing on structure of herds during removals? (Especially regarding removal of stallions, given their role in herd maintenance).
2. Why do we not have more studies looking at structures of herds?
3. Is sustainability of wild horse populations being considered in the context of land management and sustainability of other species on the land?
4. Is there inconsistency between management of horses on federal lands, and management of livestock?
5. Inconsistency in language in document – are you focusing on “aggressive population control” – is that your main focus? Also, why can't we look at other land uses? Are you willing to hear other goals?
6. Where can I find data on allotments for cattle and their seasonal vs. year-round use?
7. What is BLM doing to make sure that data collection is focused towards sustainable herds? When will permittees pay enough so that studies can be done?
8. Why doesn't BLM use natural order to manage horses?
9. Is the proposal for sex ratios 50-50? How many mares are you projecting to treat with PZP in fiscal year (FY) 2011?
10. If BLM is not a single use agency, what other uses does BLM manage?
11. Does BLM monitor mortality rates? Will BLM disclose the basis for the 20% reproduction rate statistic?
12. Where can the public find monitoring data aside from in environmental assessments?
13. What does “develop in-house gather capabilities” mean?

Comments:

1. Need site-specific management plans, not a one-size-fits-all management plan. (95)

2. Develop a management strategy that contains multiple tools that can be adapted for each landscape. Develop education program for BLM personnel – focus on management, training. (50) Invite working partnerships on projects, maintenance, monitoring, gathers, training. (60). Continue/expand inmate training programs. Consider adoptions a limited tool. Do not further relax adoption standards. Keep horses on the range – open closed HMAs and consider other options. Focus on birth control. (30).
3. Horses are more numerous in my district than BLM estimates. This is not sustainable over the long term. BLM needs to use every tool available to balance uses and species needs. (30)
4. Federal government is managing the wild horse population too low. Need to use partnerships and appropriate habitats to allow horses to live on more lands. This is the “reserve design” concept. (50)
5. Support expanded use of fertility control programs. (20) BLM should commit to using funding increases to use state of the art economic model developed by HSUS to design/implement long-term on-range management. (5)
6. Recommend that BLM place all previous management proposals on its website. (70) Recommend that the secretary consider forming a new division within the Department of Interior (DOI) responsible for wild horse and burro protection and management. (70)
7. Proposing that non-breeding herds and bringing herd levels below genetically viable herd levels are not sustainable. Skewing sex ratios disrupts social order for herds. (50)
8. BLM should publish district information (e.g. monitoring figures) on websites. (50)
9. Roller-chopping provides more grass for horses. Darting is allowing horses to lead longer, healthier lives. We use 4 traps to bring horses in – results in less territory for horses to cover.
10. Need to determine adequate AML and census. Should consider using predator drones to do horse census. (80) Do not use helicopters for gathers.
11. Should not use single species management because it harms the ecology and negatively impacts tax revenues. (20)
12. Separating stallions from mares is ok, but you have to keep the harems together when returning the animals. Also cannot combine harems. Disruption in social order results in population increases. Bait trapping and water trapping can reduce fertility rates, may not require us to use PZP. (80)
13. Stop killing predators with sodium cyanide – cost is greater than 2 years of wild horse & burro program budget. Roundup plan without herd management plan is worse than using PZP. Should not roundup horses over 3 years old. PZP darting can be done 40 horses at a time from helicopters. Don't remove horses that are publicly accessible; remove others if necessary. Take down fences separating horses from water and the range.
14. Need further opportunity for everyone here to present ideas and solutions. Should have workshops dedicated to these topics, e.g. fertility. (60)
15. Support proper census techniques. Conversion of grazing is over-simplified, need to focus on overall rangeland health. (50)
16. Can BLM ask Congress to review user fees to align with actual costs of use? (40)
17. Want BLM to use minimal herd interruptions as feasible. Need to know what the numbers are for sustainable herds and the premise for those numbers. Should return older stallions and mares to the range. (60)
18. Support focusing on thriving ecological balance. Support fertility control and research to enhance long-term applicability. Consider effective and humane use

- of euthanasia and sale without limitation. State wildlife agencies specifically called out to consult on land/species management. (15)
19. BLM should consider other alternatives before horse removal, e.g. water developments, drift fences. BLM should report monitoring of horses after PZP use. Recommend no use of PZP on at-risk herds. (60)
 20. Need to get numbers down to adoptable level before this program can work. (20) Use funds to improve range management. (60)
 21. Need to focus on working together to find the right solutions and make the program work. (85) Consider various models for preserves.
 22. Concerned about sole focus on PZP – want BLM to compete that work so it's not a sole voice influencing decisions. (60) Need to do genetic studies before implementing population control measures. (60) Need to build a plan for adoptions to ensure that we increase the economic base of wild horse management.

Draft Strategy Element: Placing Excess Animals Into Private Care

Questions:

1. How do you determine what animals are adoptable vs. un-adoptable? Maybe look at adaptability to socialization rather than strict age limits?
2. How do we get to see horses if they are in private adoption?
3. What assurance does the public have that internet adoption will not lead to euthanasia?
4. Are you taking into consideration impacts to the private horse industry?
5. How will BLM increase the numbers of adopted horses to match the number of excess horses?
6. Why is BLM offering Calico horses up for adoption so soon when other horses in short-term holding can be used, especially when there is a deal for some Calico horses to be returned to their home range?
7. Is the number of 35,000 horses in holding still accurate?
8. Is there a way to gift horses to those who could benefit from them therapeutically? Is there a program that could work with BLM to train animals for this purpose?
9. Can you give more information about providing storefronts for adoption?
10. Why gather when adoptions are down and so many horses are in holding?
11. How does BLM measure effectiveness of adoptions that are internally done vs. when done by external organizations? How do you measure success?

Comments:

1. Horses need to get placed in good homes where people will spend disposable income on maintenance (bring \$\$ into local economy). (5) Training programs and adoptions need to be workshopped beyond the scope of this meeting. Need integrated rather than piecemeal approach. (10)
2. Best Friends Animal Society (southern Utah) does a good job placing un-adoptable animals successfully. Great results. Good model for us to look at. (20)
3. Support virtual adoption program. Could be vehicle for education/awareness, offsets costs, does not compete with domestic horse market. (10)
4. BLM should consider working with advocacy groups to adopt out horses. That's how public can see that horses are in need of homes. We should focus on

- emergency roundups only, and instead work on finding homes for horses, and returning horses to HMAs and HAs.
5. Labeling horses as “untrainable” based on age isn’t appropriate. Suggest that roundups focus on younger horses. (40)
 6. BLM is adopting horses to some people who are not qualified to own wild horses – unsuccessful adoptions. Need better qualifications for adoptions. (50)
 7. Private horse industry supports hundreds of thousands of jobs; BLM should consider impacts to that industry. Support the adoption program but need to consider human/economic impacts. (15)
 8. Humane slaughter needs to be an option for management. When horse industry was thriving, adoptions were also high.
 9. Number of horses adopted is central to this whole program – relates to number of horses in the wild. This element has not been fully developed yet and needs further thought. Need structure to get training so horses can be adopted out. Should use these animals for federal and state use (e.g. military, police, etc.). Should provide tax incentives for trainings. (30) Develop post-prison program (60).
 10. How can we educate potential adopters and how do we take animals back in cases where adoptions do not work out, to ensure safety? Opposed to sending horses overseas. Opposed to slaughter.
 11. Reducing adoption requirements should not be considered. Currently BLM is getting horses back because adoption requirements are not being applied as strictly as they used to be. (80) Should leave good looking horses out on the range. (40)
 12. Encourage adopt-a-herd program to generate \$\$ on horse’s home range without removing them. (50)
 13. Extreme Mustang Makeover really successful; program should be expanded. (60) BLM needs to look for private stakeholders who will spend their own resources to adopt out horses and provide education/awareness. (10)
 14. Need consistent approach for adoption, e.g. 2-for-1 vs. mustang makeover. (30) Need to capitalize on strengths of the animals (e.g., athleticism). (40)
 15. True value of mustangs is on the range. Sticking ability of adoptions is the most important aspect. Focus on youth adopting horses. MARKETING. Tell the stories through professionals. (100)
 16. Do not think there is much competition between mustang adoptions and domestic horse industry.
 17. Three ways to deal with excess horses: adoption, predators, birth control. We have not talked about predators.
 18. Encourage BLM to take better pictures to get people to fall in love with the horses and want to adopt them. Encourage BLM to partner more with trainers. Some wild stallions need to stay on the range and not be adopted – should continue to breed on the range.
 19. Need mentoring program for adopters who are struggling with the adoptions. (80)
 20. Recommend evaluation of horses for suitability for being turned back to the range or adopted out. (25)

Draft Strategy Element: Animal Welfare

Questions:

1. What is the progress on getting independent humane observers at roundups?

2. What are criteria for credible, independent observers?
3. Why are public held back from holding pens at long- and short-term holding pens?
4. Why is BLM only working with certain organizations as observers, and not the general public?
5. Is animal welfare of horses on the range incorporated in the animal welfare program?
6. Are wild horses considered wildlife?
7. Are you considering that working with certain organizations may jeopardize your credibility because of the stances these organizations take on other issues?
8. Would you consider mandatory education for BLM personnel working with wild horses?
9. Is it possible that using videos with explanatory commentary can be used by BLM as education?
10. Are you looking at performance criteria for your staff re: animal welfare?
11. Shouldn't independent observers be able to intercede when something wrong is occurring?
12. Why are you saying that facilities are open to the public, when some are not?
13. Is BLM willing to have ongoing weekly inspection at all facilities by independent observers?

Comments:

1. Recommend clarifying periodic assessments of animal welfare issues, e.g. quarterly, semi-annual. Need to pursue having more veterinarians per facility. (50) Support independent assessments. (40)
2. Recommend using web cams during large roundups to help build trust. Should have contracts written so that public has access to long-term holding facilities. (50)
3. Recommend annual gathers at every HMA to take care of horses in need of care. (10)
4. Encourage as much transparency as possible. (50) Should increase water availability on the range. Encourage interagency cooperation to improve rangeland habitats. (70)
5. Want to see BLM show more understanding of and respect for social integrity of herds. Encourage respecting family bands during gathers. (60)
6. Understand that some poor health of animals on the range is a natural thing. (70)
7. Public access must be allowed at all aspects of management, including monitoring. Need 100% transparency. (60). Concerned about BLM consultation with some groups and not others.
8. Concerned about enhancing ranges – animals are wild, and the land should be wild and left in its natural state as well. (30)
9. Horses and burros on the range are treated much more humanely than those in holding.
10. Welfare has to begin on the range. Timing of the gathers is very important – need BLM to consider conditions on the range before deciding to bring in the horses to ensure that horses are strong enough to survive the gathers. (40)
11. Want to see BLM have ability to prosecute people who disrupt gathers. (20)
12. Horses should not be penned alone, they need buddies. Need to consider holistic treatment of horses. (50)

13. Appreciate slaughter being off the table for consideration. Slaughter facilities not designed for equine use; encourage review of GAO report that addresses this. (50) Survival of the fittest crucial for species to remain healthy.
14. BLM needs to consider whether the public is willing to have wild horses die on range lands. Need BLM leadership around this issue. (20)
15. Consider alternate ways of chuting horses into holding pens that might result in less stress to the horses. Will need public observation to help with this.
16. Need additional time to discuss animal welfare. Need more than submission of comments – need more interactive ways to discuss this issue. (70)
17. Need performance appraisals of private contractors regarding animal welfare. Want to see public input into contract issuance and renewal. (60)

Draft Strategy Element: Science & Research

Questions:

1. How can BLM use public lands for wildlife habitat if land is also being used for oil/gas and renewable energy? Where does BLM stand on restoring riparian habitat?
2. What percent of BLM's FY 2011 budget request is dedicated to science, research, and range monitoring/management issues?
3. When will you raise monitoring budget percentage up to 50-60%?
4. Out of your 180 herds, how many have not been manipulated in the last 5 years? What baseline behavioral studies have been done on herds not manipulated through gathers? Will BLM fund wild horse private research that benefits the species/species management?
5. Question about population control metric on BLM website – how does research support the combination of these multiple techniques as an appropriate metric?
6. Would BLM be willing to use predator drones to conduct censuses?
7. Has BLM assessed whether removals of horses have resulted in any improvements out on the range? Are those evaluations available to the public?
8. What is the scientific basis for the instruction manual on the selection removal policy?
9. How can the public comment on this section where there is not enough information?
10. Will BLM start using a correction factor in population modeling with any of these survey methods?
11. Why can't we start with BLM's Final Report for the Analysis of Inventory and Monitoring Activities in BLM (Oct 2008) as a basis for the program, rather than using the Secretary's initiative?
12. How will sage grouse protections influence wild horse management? Which species take priority?
13. Is it possible to change budget allocations for FY 2011 budget requests?
14. Why wasn't the new AML handbook opened up for public comment?
15. Cattle have no upper teeth and use their tongues to pull out forage. Cattle are not top down grazers. Horses are top down grazers and mow plants and move around creating high and low grass and plant tillery causing more ground coverage. Why does the BLM say cattle are top down grazers in cattle grazing permit EAs and thereby improve biodiversity? Why doesn't the BLM mention this in favor of horse grazing in the EAs on wild horse and burro HMAs?

16. Why would we implement any kind of program where we did not fully understand the implications of what we were doing (per the objective in the strategic development document)?
17. Why is the research land management-oriented and not horse-oriented?

Comments:

1. Need research and science on birth control. (20)
2. Interested in monitoring in riparian, perennial streams and systems. That is an indicator about where you have habitat problems. Support ground-up research on habitat relationships – useful for management of multiple species. (50)
3. Support science and research element. Need to improve methodologies for population census. Other studies show current population estimates are low. (40) Also need to measure impacts of wild horses and burros on other species and habitats.
4. Suggest we not research permanent sterilization techniques but look into more natural approaches for population control, e.g. predators. (40) Need current data to make decisions. (40)
5. Encourage more interagency collaboration on data collection (e.g. with EPA). (50) Encourage riparian conservation.
6. Current lack of rangeland monitoring; also having a problem with overpopulation. With climate change, changes in vegetation on the range, need AMLs re-evaluated regularly and matched to changing needs of wildlife.
7. Propose moratorium on gathers for several herds in order to get behavioral baseline data. (50)
8. Use existing data to inform site-specific management strategies. (70) Also use research to compare what “normal” behavior is vs. what you observe with your herds.
9. Suggest that self-regulation be incorporated into a research program. (70) Also want research on long-term health impacts (esp. behavioral) of gathers, short-term holding, and long-term holding. (50)
10. Need more baseline information on impacts of livestock facilities on areas used for wild horse habitat. (50) Don’t want sole focus of research on riparian areas; upland also important.
11. Let’s have more workshops and include research or subject matter experts to help us have fact-based discussions. (80)
12. BLM should implement USGS research/recommendations. (40) Need to focus on having third-party experts do studies. Science should be the basis for this whole program.
13. Need to incorporate studies on livestock and wildlife usage on wild horse areas – have to study this holistically. (90)
14. Need to be clear about potential impacts of moving horses to the Midwest and east before moving horses there. Need to focus on multiple use and science.
15. Want to see information about financial impacts to ranchers and others due to non-compliance with AMLs. (15)
16. Need to find ways to fund research (e.g. private sponsors). Instead of funding gathers, apply the funding to research. (50)
17. Propose 50% budget on studies about horses in their natural habitats. (40) Create an action plan based on studies, make it fully transparent and available online.